



**CONESTOGA-ROVERS  
& ASSOCIATES**

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April 1, 2010

Reference No. 038443

Ms. Karen Cibulskis  
Remedial Project Manager  
United States Environmental Protection Agency - Region V  
77 West Jackson Boulevard  
Mail Code SR-6J  
Chicago, IL 60604

Dear Ms. Cibulskis:

Re: Agreed Upon Scope of Streamlined and Conventional Feasibility Study (FS) Reports  
Administrative Settlement Agreement and Order on Consent (ASAOC)  
Docket Number V-W-06-C-582  
South Dayton Dump and Landfill Site, Moraine, Ohio (Site)

This letter documents the discussions between the United States Environmental Protection Agency (USEPA) and the ASAOC Respondents regarding the proposed scope for the Streamlined Feasibility Study (FS) for the Site. Conestoga-Rovers & Associates (CRA) has prepared this letter on behalf of the ASAOC Respondents with review and comment by USEPA.

On February 24, 2010, representatives of the USEPA, the Ohio Environmental Protection Agency (Ohio EPA), and the Respondents met to discuss the scope of the Streamlined FS and the conventional FS for the Site and the boundaries of operable unit one (OU1) and operable unit two (OU2). At the meeting, USEPA, Ohio EPA, and the Respondents agreed to the scope for the Streamlined OU1 FS and the conventional OU2 FS for the Site. On March 5, 2010, the Respondents submitted a draft letter summarizing the Respondents' understanding of the agreed upon scope for the Streamlined OU1 FS and the conventional OU2 FS for the Site. On March 15, 2010, the USEPA issued a letter providing comments on the Respondents' draft March 5, 2010 letter. This letter contains modifications to the March 5, 2010 draft letter to address some of the comments.

*Streamlined Feasibility Study for OU1*

OU1 comprises the Site as defined in the ASAOC as well as certain adjacent parcels upon which waste was placed by the Site operators. As discussed in the meeting, OU1 includes the Quarry Pond. Specifically, OU1 includes the following parcels (see attached Figure 1):

- Lot 5054 (Valley Asphalt)
- Lots 5171, 5172, 5173, 5174, 5175, 5176, 5177, and 5178 (Boesch and Grillot Plat)

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- Lots 3753 and 4423 (Jim City Salvage)
- Lots 4610 and 3252 (Ronald Barnett)
- Lot 3274 and the portions of Lots 3278, 3056, 3057, 3058, and 3275 upon which waste has been placed (Miami Conservancy District)

The Streamlined OU1 FS will consider containment as the appropriate remedial approach for the landfill contents, and thus will evaluate capping and landfill gas and soil vapor requirements and will take into consideration the following:

- Human health and ecological risks posed by the contaminants present in these areas
- The nature of the waste disposed of on the various parcels in question
- The applicable or relevant and appropriate requirements (ARARs) specific to the types of waste disposed of at the Site
- The presence of active businesses on a number of the parcels

The Streamlined OU1 FS will also include an assessment of treatment options for shallow groundwater (i.e., nominally at an elevation above approximately 675 ft above mean sea level [ft AMSL] or above the first till layer, whichever is encountered first) beneath the Site<sup>1</sup>. As discussed, the assessment will focus on treatment options for addressing the sources of shallow groundwater contamination and will include options for addressing Site related contaminants if contaminants in the shallow groundwater are currently migrating off-Site such that MCLs, or in the absence of MCLs unacceptable risk levels (i.e., an excess lifetime cancer risk above  $1 \times 10^{-4}$  or a hazard index of 1), would be exceeded at current down-gradient receptors. Existing off-Site impacts will be addressed as part of the OU2 FS. The Streamlined FS will also include a scope of work for the additional investigation required to delineate the sources of shallow groundwater contamination in the areas discussed below.

The specific areas of shallow groundwater contamination that will be addressed as part of the OU1 FS are summarized below.

VAS-09

The Streamlined OU1 FS will evaluate remedial options for contamination at VAS-09/MW-215 above the till layer that is present between approximately 682 and 694 ft AMSL. Contamination

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<sup>1</sup> As discussed during the meeting, the delineation of shallow groundwater is not absolute and where shallow OU1 groundwater contamination extends a short distance below 675 ft AMSL, the contamination below 675 ft AMSL would also be remediated where feasible.



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below the till layer will be addressed as part of the deeper groundwater assessment completed in the conventional OU2 RI/FS.

VAS-04/MW-219 LNAPL

The Streamlined OU1 FS will evaluate remedial options for the light, non-aqueous phase liquid (LNAPL) in VAS-04, N1, S1, S2, W1, and W2, including a darker oily material at the base of W1. This area also includes constituents observed above MCLs and health screening levels in MW-219. The approximate elevation of the LNAPL in VAS-04 is 709 to 704 ft AMSL.

VAS-21/MW-210

The Streamlined OU1 FS will evaluate remedial options for the TCE contamination present in groundwater at MW-210 and contamination at VAS-21/MW-210 above the till layer, which is present between approximately 695/700 ft AMSL and 686 ft AMSL. Contamination below the till layer at 686 ft AMSL will be addressed as part of the deeper groundwater assessment completed in the conventional OU2 RI/FS.

VAS-08

The Streamlined OU1 FS will evaluate remedial options for the contamination present from the water table down to the till layer at VAS-08, which is present between approximately 671 and 675 ft AMSL. Contamination below the till layer at 671 to 675 ft AMSL will be addressed as part of the deeper groundwater assessment completed in the conventional OU2 RI/FS.

VAS-15

The Streamlined OU1 FS will evaluate remedial options for the contamination present from the water table to approximately 50 ft-bgs in VAS-15 (elevation 702-681 ft AMSL) where the concentrations of TCE decrease to below the MCL. Contamination below 681 ft AMSL will be addressed as part of the deeper groundwater assessment completed in the conventional OU2 RI/FS.

A letter work plan for additional investigation of the shallow groundwater contamination in the area of MW-210 was submitted to USEPA on March 16, 2010.

The Streamlined OU1 FS will include a risk assessment, ARARs analysis, remedial action objectives, alternatives array, and detailed evaluations of containment options for the landfill contents, landfill gas and soil vapor requirements, and remedial options for the shallow groundwater. The Remedial Investigation (RI) data reported in the various letter reports will be included in a single OU1 RI report.



Conventional Feasibility Study for OU2

As agreed during the February 24, 2010 meeting, the scope of the conventional OU2 RI/FS will be in accordance with that detailed in the Statement of Work with some modification. Specifically, the conventional OU2 RI/FS will be completed for the following areas:

- Landfill material, surface, and subsurface soil and hot spots outside the OU1 Area (e.g., the floodplain area between the Site and the Great Miami River) attributable to historic Site activities
- Deeper groundwater (i.e., nominally at elevations below 675 ft AMSL) within and outside the OU1 Area
- Shallow groundwater outside, the OU1 Area
- Leachate outside the OU1 Area (e.g., the floodplain area between the Site and the Great Miami River)
- Landfill gas and soil vapor outside the OU1 Area
- Surface water and sediment outside the OU1 Area (e.g., the floodplain area between the Site and the Great Miami River)
- Air outside the OU1 Area

A conventional RI Report will be completed for OU2. The conventional OU2 FS will include a baseline risk assessment, ARARs analysis, remedial action objectives, alternatives array, and detailed evaluation of alternatives.

At the February 24, 2010 meeting, USEPA, Ohio EPA and the Respondents agreed to the following milestone dates:

- April 30, 2010: Submit streamlined OU1 RI/FS Report to USEPA
- May 3, 4, or 5, 2010: Meeting to discuss scope of OU2 RI/FS Work Plan
- May 31, 2010: Submit conventional OU2 RI/FS Work Plan to USEPA

During the preparation of the OU2 RI/FS Work Plan, the Respondents will prepare a schedule for the remaining investigative activities and the submission of the OU2 RI/FS Report.



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In the meantime, please call the undersigned if you have any questions or comments.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Stephen M. Quigley

AL/ca/77

Encl.

cc: Tim Prendiville, USEPA (PDF)  
Matt Justice, Ohio EPA (PDF)  
Robert Frank, CH2M Hill (PDF)  
Ken Brown, ITW (PDF)  
John Hartje, NCR (PDF)  
Scott Blackhurst, Kelsey Hayes Company (PDF)  
Jim Campbell, EMI (PDF)  
Paul Jack, Castle Bay (PDF)

Karen Mignone, Verrill Dana (PDF)  
Robin Lunn, Winston & Strawn (PDF)  
Wray Blattner, Thompson Hine (PDF)  
Tim Hoffman, Dinsmore & Shohl (PDF)  
Chris Athmer, Terran (PDF)  
Kelly Smith, Terran (PDF)  
Adam Loney, CRA (PDF)



